



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

**Ambrose Moses III, Esq**

Extension Educator, CED  
Cooperative Extension Service  
Central State University  
[amoses@centralstate.edu](mailto:amoses@centralstate.edu)

**April 16, 2024**

**To:**

**Alex Johnson**

[abjohnson@centralstate.edu](mailto:abjohnson@centralstate.edu)

**F. Erik Brooks**

[febrooks@centralstate.edu](mailto:febrooks@centralstate.edu)

**Morakinyo Kuti**

[mkuti@centralstate.edu](mailto:mkuti@centralstate.edu)

**Laura Wilson**

[lwilson@centralstate.edu](mailto:lwilson@centralstate.edu)

**Pamela Bowman**

[pbowman@centralstate.edu](mailto:pbowman@centralstate.edu)

**Ibrahim Katampe**

[ikatampe@centralstate.edu](mailto:ikatampe@centralstate.edu)

**Subject:** Formal Complaint of Copyright Infringement, False Attribution, Plagiarism, Academic Dishonesty, Retaliation, and Hostile Work Environment

Dear University Leadership:

I, Ambrose Moses III, a CED Extension Educator at Central State University, am writing to formally file a complaint against Mark Rendleman, CED Program Leader at Central State University, for violations of, including but not limited to, the University's Professional Code of Conduct, Intellectual Property Policy, Copyright Infringement, False Attribution, Plagiarism, Academic Dishonesty, Retaliation, and Hostile Work Environment occurring from on or about February 2, 2024 to the present.

I also petition and request all available due process from the University in addressing the multiple issues of state and federal law, common law, and University policy that comprise this matter.

## **Background and Context**

Ambrose Moses III ("Moses") holds a Juris Doctor degree from The Ohio State University College of Law and is a licensed attorney in the State of Ohio. During his years of service to



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

the community, he has engaged in a general law practice, Staff Attorney with the Legal Aid Society of Columbus, Associate General Counsel with the Ohio Civil Service Employees Association (OCSEA, AFSCME Local 11, AFL-CIO), and handled a wide range of civil, administrative, and criminal matters which include, but are not limited to, business entity formation, contracts, mergers and acquisitions, residential and commercial real estate, personal injury, copyright, trademark, entertainment transactions, nonprofit formation, tax exempt organizations, unemployment claims, workers compensation claims, employment discrimination, collective bargaining, community development corporations, affordable housing, access to capital, consumer protection, juvenile adjudications, misdemeanor and felony litigation, civil rights, trials, state and federal appeals, and *pro bono* community-based workshops and presentations.

Moses' primary area of practice, professional engagement, and passion is community development, economic development, empowerment, and business law.

Moses' path towards Central State University began in the early 2000's when he focused his professional service upon small business development and community empowerment. From 2004-2009, Moses worked as a Staff Attorney with the Legal Aid Society of Columbus. In 2010, he returned to full-time private practice, with a focus on expanding access to legal services by low and moderate income individuals in the area of civil matters, primarily business and transactional law. As part of the mission of his law practice, Moses volunteered and delivered business law-related workshops and presentations to groups at the Central Ohio Minority Business Association (COMBA), the Ohio Small Business Development Center (SBDC), the U.S. Small Business Administration (SBA), and others.

In 2015, Moses was awarded the U.S. Small Business Administration Legal Assistance Champion of the Year.

In 2010 Moses authored his framework for addressing the formation of business entities and expressed it in writing and electronic format via a PowerPoint presentation. Around this same time, after observing a need for a more accessible business planning process, Moses developed and authored a 4-Page Business Plan framework and expressed that in writing.

Over the years, Moses has, and continues to, refine these works. These works are protected by copyright law. When these works are combined with an in-person or virtual lecture or are recorded, the combined work constitutes an interactive textbook on the topics of entity formation and business planning. The layout and content of the works, coupled with Moses' unique delivery elucidates these two critical areas of business development in a manner that is accessible to virtually any teenage to adult learner. This ability to elucidate and empower



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

the learner with useful and usable knowledge is a significant aspect of Moses' personal brand as both an educator and a professional.

On March 1, 2017, Moses joined Central State University's Cooperative Extension Service as the University's first County Extension Agent. By March 14, 2017, at the direction of the Associate Director of Extension, Moses modified one of his existing works concerning business entity formation for use in his first presentation as a CED County Extension Agent, titled "Intro to LLCs & Corporations". In the weeks following March 2017, Moses developed a series of curriculum modules, including, but not limited to, the topics of entity formation and the 4-Page Business Plan.

By Fall of 2017, the Cooperative Extension Service had hired Anthony Barwick as the CED Program Leader. By the Spring of 2018, Moses and Barwick had collaborated on the unique methodology of a cooperative extension business development program that Barwick branded as Ready, Set, Grow!.

The methodology of Ready, Set, Grow! is that it includes a growing body of knowledge and educational content that is created and curated by the team of CED Extension Educators. This body of knowledge and content is then customized into curriculums to address the identified needs of the audiences with whom the CED Extension Educators engage. Some examples are "Ready, Set, Grow!", "RSG!: Agriculture", "RSG!: Entrepreneur Toolkit", and "RSG!: Small Business".

As a result, while our Cooperative Extension Service, is in its infancy, it would engage with "wantrepreneurs" and startup businesses and agribusinesses. But, over time, the diversity of businesses served would begin to include established and mature businesses.

Moses' business entity formation work and 4-Page Business Plan work were included in the curriculum for the Ready, Set, Grow! program. Moses' work remains a cornerstone part of that signature CED program today.

CED Educators at Central State University are researching, developing, and delivering innovative extension content, services, and educational experiences. For instance, in recent months, Moses has also proposed an innovative utilization of AI and GPT technology in the delivery of Cooperative Extension Services, using the 4-Page Business Plan as a pilot.

This could be a way to commercialize and expand the reach and impact of Cooperative Extension professionals, utilizing the Ohio I.P. Promise Initiative. In fact, another CED Extension Educator is currently exploring the Ohio I.P. Promise Initiative and other



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

commercialization options for their work. The academic, innovation, and intellectual property works of University faculty and staff, including staff in the University's Cooperative Extension Service, are important, valuable, and deserving of protection.

Mark Rendleman is the CED Program Leader at Central State University. Among other things, his essential duties and responsibilities include developing and delivering CED objective and research-based educational programs to meet the needs of diverse audiences in Ohio. As CED Program Leader, Mr. Rendleman is also responsible for reviewing, knowing, and approving the content of the curriculums that are part of the CED programs he develops and delivers.

On February 2, 2024, Mark Rendleman, CED Program Leader at Central State University, instructed the CED Team about the Growing Equity Partnership Grant and stated--

**"The scope of this New Farmer Business Education work would include but not limited to: . . . Distribution of use of the curriculum developed by Eric Smith in Toledo. (Everyone is expected to coordinate with Eric Smith on his curriculum)"**

Moses contacted Eric Smith as instructed. Eric Smith informed Moses, "It's **RSG Ag**, but with a picture of the SARE book on the front." RSG Ag means **Ready, Set, Grow!: Agriculture**, which is one of the custom curriculums that had been developed as part of the Ready, Set, Grow! program methodology. RSG Ag includes the works at issue here which were authored and created by Moses prior to joining the University.

On February 6, 2024, Eric Smith sent an email to the CED Team and stated,

**"Please note that my presentations took an existing body of work and parsed them out according to the Planning Tasks in the workbook. I would like to acknowledge that I could not have done my work without significant contributions by Amber, Ambrose, and Stephen."**

On April 4, 2024, despite the clear attributions by Smith, Mark Rendleman further instructed the CED Team,

**"We will be using the New Farmer Education Curriculums refined by Eric Smith and Stephen Washington."**

On April 10, 2024, Mr. Rendleman gave further instruction to Mr. Moses that --



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

**"The curriculum is already defined for this Growing Equity Partnership education effort. Coordinate with Eric and Stephen to access that curriculum. No curriculum deviations will be approved."**

Rendleman has been, and is, actively engaged in a "quiet firing" campaign and hostile work environment against Moses. In December 2023, the University's General Counsel requested an outside investigator on Moses' Report of Unresolved Retaliation and Hostile Environment.

In the context of his responsibility as CED Program Leader and his active quiet firing campaign against Moses, Rendleman's Copyright Infringement, False Attribution, Plagiarism, Academic Dishonesty, Retaliation, and Hostile Work Environment are knowing and intentional.

Moses is a public employee with over seven (7) years of service, who has vested rights, and a property interest in his employment with the State of Ohio. Rendleman's conduct, as the Statewide CED Program Leader at Ohio's 1890 Land-Grant University, is state action and acting under color of law in depriving Moses of his property interests and his federal legal and constitutional rights without substantive and procedural due process. Rendleman's conduct exposes himself and the University to a risk of liability.

## Summary of Claims

A summary of the claims that arise from Mr. Rendleman's conduct include, but are not limited to the following causes of action:

1. **Copyright Infringement:** Mr. Rendleman, as the University's CED Program Leader, has and is using Mr. Moses' copyrighted work without authorization. Rendleman is also directing the CED Team to implement Rendleman's instructions, which is a violation of state and federal copyright law and the University's Intellectual Property Policy.
2. **Academic Dishonesty, False Attribution, and Plagiarism:** On multiple occasions, Mr. Rendleman falsely attributed Mr. Moses' work to other individuals, misleading Cooperative Extension peers and the audiences we serve, and constituting academic dishonesty.
3. **Retaliation and Hostile Work Environment:** This conduct is part of Mr. Rendleman's continued "Quiet Firing" campaign of retaliation and hostile work environment,



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

following the numerous whistleblower notices and protected activities in which Mr. Moses has engaged.

## Impact Statement

When I joined Central State University in 2017, I was proud to be associated with and part of the University, it's new 1890 Land-Grant status, it's history as an HBCU, and the role it is positioned to play in the lives of citizens across Ohio and beyond, with an unapologetic approach in advancing the needs and interests of Black Americans in Ohio and beyond. I saw this as an opportunity to grow with the University.

I engage with my colleagues with dignity, respect, and enthusiasm. That being said, Rendleman was disrespectful in refusing to acknowledge my position as a Statewide Extension Educator. He repeatedly taunted me in front of the CED Team over a period of months by representing my territory as Southwest, Columbus, or Central Ohio instead of Statewide. It culminated with he and I arguing about it during my 5 minute report period of our CED Team Meeting (via Microsoft Teams) in January 2024. I regret that I allowed him to "get in my head". However, his actions were taunting and calculated. It was like I had been disrespected and pushed to the point where I was outside my body watching this happen. The humiliation and disrespect in front of my colleagues was really beyond words to explain.

That being said, it is even more distressing when I review the public records that General Counsel provided to me and discover that Alcinda Folck, Interim Associate Administrator of Extension, and Mark Rendleman were discussing, plotting, and planning to strip away my Statewide Extension Educator status over a year ago in March 2023. This means that Mark Rendleman's repeated refusal throughout 2023 to acknowledge my Statewide Extension Educator status was intentional and calculated, and apparently in coordination with Dr. Folck.

So, now, after stripping away my Statewide Extension Educator position, Rendleman is trying to erase my authorship of my copyrighted work by falsely attributing it to another individual.

I view everyone the same. We need people in all positions throughout the organization, from the volunteer cleaning up after an event to the chairperson of the Board of Trustees. They all deserve the same level of dignity and respect.

I freely share my knowledge, information, and understanding with the community and my colleagues at the University. I ask questions to explore and understand "what" it is, "how" does it work, "why" is it like that. I think and analyze things. I offer ideas, suggestions, and proposals. I test, experiment, and evaluate new and different ways to improve how we



CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

educate and impact. That is part of the reason my business entity formation work and my 4-Page Business Plan work have endured the test of time (and why I am developing an implementation of it via AI and GPT technology). It is also why my authorship, work, copyright, and intellectual contribution should be respected by the University's CED Program Leader.

## Requested Actions

Given the range and magnitude of legal, ethical, academic integrity, and university policy issues raised by Mr. Rendleman's conduct, I do not know who all are the appropriate University officials and offices to whom this should be addressed.

I am sending it to who appear to me to be appropriate University officials. However, I do ask your assistance in identifying such persons.

To that end, I urge the Provost & VP of Academic Affairs, Director of Land-Grant, Office of the General Counsel, Director of Human Resources, Chief Intellectual Property Officer, Intellectual Property Advisory Committee, Intellectual Property Rights Resolution Board, Administrator of the University's Ohio I.P. Promise program, and AAUP to conduct a thorough investigation into these allegations and enforce appropriate corrective measures including:

- Rectifying the attribution of all work and materials I have developed.
- Ceasing the unauthorized use of my copyrighted materials.
- Considering corrective actions against Mr. Rendleman for his violations of law and the University policies, including but not limited to, the Professional Code of Conduct, Academic Integrity, and his retaliatory behavior.
- A request for all available due process from the University in addressing the multiple issues of state and federal law, common law, and University policy that comprise this matter.
- A request for workshops on copyright law and academic integrity within the Cooperative Extension Service.
- A request for training on the benefits, value, and process for utilizing the Ohio I.P. Promise Initiative and the University's efforts in that regard.

I am prepared to provide further details and documentation to support this complaint and am willing to meet to discuss this matter at your earliest convenience.





CENTRAL STATE UNIVERSITY EXTENSION

P.O. BOX 1004 ♦ WILBERFORCE, OH 45384-1004 ♦ 937-376-6652 ♦ FAX 937-376-6680

Thank you for your attention to this serious matter. I trust that the University will uphold its standards of integrity and fairness by addressing this complaint promptly.

Sincerely,

/s/ Ambrose Moses III

**Ambrose Moses III, Esq**

*Extension Educator, Southwest Region*

*Community & Economic Development*

**Central State University Extension**

1400 Brush Row Road | Wilberforce, Ohio 45384

(614) 432-4300 (mobile)

[amoses@CentralState.edu](mailto:amoses@CentralState.edu)